

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VARIANT HOLDINGS, LLC, et al.

v.

Z RESORTS LLC, et al.

Civil Action No. 2:11-cv-290-JRG

CONSOLIDATED CASE

**JOINT MOTION TO STAY ALL DEADLINES AS TO
LOEWS CORPORATION AND LOEWS HOTELS HOLDING CORPORATION**

Plaintiffs Variant Holdings, LLC and Variant, Inc. (collectively, "Plaintiffs") and Defendants Loews Corporation and Loews Hotels Holding Corporation (collectively, "Loews"), by and through their undersigned counsel, file this Joint Motion to Stay All Deadlines as to Loews. The parties have reached a settlement in principle and are currently exchanging documentation relating to the settlement agreement. Accordingly, the parties respectfully request that the Court stay all proceedings, including deadlines, for 30 days in this case as between Plaintiffs and Loews, up to and including May 31, 2013. This limited extension of time is for good cause and so that justice may be served. All other deadlines as to the remaining defendants would remain unchanged.

A proposed order is attached.

Dated: April 29, 2013

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(with permission by Jennifer P. Ainsworth)
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Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3), on this the 29th day of April, 2013.

/s/ Jennifer P. Ainsworth
Jennifer Parker Ainsworth

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Loews Corporation and Loews Hotels Holding Corporation has complied with the meet and confer requirement in Local Rule CV-7(h) and as this is a joint motion it stands unopposed.

/s/ Jennifer P. Ainsworth
Jennifer Parker Ainsworth